



Extra Information
9/22/08
Consent
#7

TOWN OF ACTON
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Board of Selectmen
Lauren Rosenzweig, Chairman

pls approve letter

September 22, 2008

Mr. Derrick Golden
Waste Management Division
U.S. Environmental Protection Agency
Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Subject: Comments on Monitoring Program Report, 2007
W.R. Grace Superfund Site, Acton, Massachusetts
Report prepared by GeoTrans
Dated: July 31, 2008

Dear Derrick:

Thank you for your email response of September 17, 2008 to the Town's comments regarding the 2007 Monitoring Program Report. This letter is written to alleviate any misunderstandings regarding some of the specific concerns in the Town's previous comments.

The Board of Selectmen appreciate your clarification that in 2006 a notification was made regarding the presence of 1,4 Dioxane in monitoring wells ELF, LF-06C, LF-06N, LF-19SBR, MLF, WLF, MW-06B, MW-06D, MW-07B and MW-07D. At that time, within four months of the sample date, it was determined appropriate to notify not only the Acton Water District but also the Town and ACES of these results. As noted in your letter at the time some of these wells were in an area where potential extraction wells would be placed. None of these monitoring wells were on Water District property or adjacent to one of their production wells.

As noted in the Town's current comment letter awareness of 1,4 Dioxane in AR-30D, adjacent to the Christofferson well, did not come until the monitoring report of 2007 was received in August of 2008. In this case EPA did not send out a notification letter as was done in 2006 despite a potential concern that a trend of increasing levels of 1,4 Dioxane in greater proximity to the Town's drinking water supply could be interpreted.

The intent of the Town's comment was not to raise a concern that 1,4 Dioxane was within the Northeast plume but that a notification process that was evident in 2006 was no longer evident in 2008. As was stated in the comments it is reasonable for the Town, Acton Water District and ACES to expect the same type of notification now as was received in 2006.

The Town believes that a timely notice of a contaminant that could be of concern to the AWD is essential, regardless of whether that detection is from an annual monitoring round or some other sampling event. In this case the detection of 4.4ug/L of 1,4-dioxane at a monitoring well adjacent to a drinking water supply well warranted quicker notice to the all of the Acton stakeholders. Previous detections were both lower and farther away from the public water supply wells.

The Town appreciates EPA's requirement that WR Grace test for 1,4-Dioxane in appropriate monitoring wells at the WR Grace Superfund Site. In addition, the Town appreciates that when the contaminant was found in the Northeast Area and elsewhere on the site in 2006, the Acton Water District, the Town and ACES were notified within four months of the samples having been taken. In contrast, approximately 10 months elapsed since the 2007 sampling round for the Acton stakeholders to learn that 1,4-dioxane had been detected at a monitoring well adjacent to a public water supply well, at a level higher than the MA DEP drinking water guideline of 3.0 ug/L.

As was stated in the Town's previous comment letter it is requested that notification be timely and be to all stakeholders.

Thank you for your consideration of these additional comments regarding the 2007 Monitoring Program Report.

Sincerely,

Lauren Rosenzweig
Chairman
Acton Board of Selectmen

Cc: Mary Michelman, ACES
Jennifer McWeeney, DEP
Chris Allen, AWD
Stephen Anderson, Anderson & Kreiger
Jane Ceraso, AWD
Doug Halley, Acton Health Director
Steve Ledoux, Acton Town Manager
Jim Okun, OT&O
Brent Reagor, Concord Health Director
Sarah White, USEPA